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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Internet Sports International, Ltd.,

Plaintiff,

v.

Amelco USA, LLC. et al.,

Defendants.

Case No.: 2:23-cv-00893-ART-NJK

**DECLARATION OF TRAVIS  
DEARMAN IN SUPPORT OF ISI'S  
FIRST MOTION TO COMPEL THE  
PRODUCTION OF DOCUMENTS**

I, Travis DeArman, declare as follows:

1. I am an attorney and principal at the law firm of McKool Smith P.C. ("McKool Smith").

2. I and McKool Smith represent Plaintiff Internet Sports International, Ltd. ("ISI") in the above-captioned action.

1           3.       I submit this declaration pursuant to Local Rule IA 1-3(f) and 26-6, in support of  
2       ISI's first motion to compel the production of documents.

3           4.       I conferred with counsel for Defendants Amelco USA, LLC and Amelco UK, Ltd.,  
4       by telephone or teleconference (Zoom) on multiple occasions from December 2023, through  
5       January 2024 concerning the relief requested in ISI's motion to compel. John Tennert served as  
6       lead counsel for Defendants on these conferences, which were also attended (at times) by Wade  
7       Beavers and/or MaryJo Smart, counsel for Defendants. Also participating in certain conferences  
8       were my colleagues Patrick Pijls and Taylor Perez, both of McKool Smith.

9           5.       One such conference occurred on October 23, 2023. The parties discussed the entry  
10      of a protective order and ESI protocol, as well as scheduling, Defendants' threatened jurisdictional  
11      challenge (later abandoned), and Defendants' potential request for a stay of discovery (later  
12      abandoned, or at least never formally requested).

13          6.       One such conference occurred on December 11, 2023. I and Patrick Pijls attended  
14      for ISI. John Tennert attended for Defendants, and I believe other counsel were also present for  
15      Defendants. The parties discussed Defendants' objections and responses to ISI's discovery  
16      requests. On behalf of ISI, I tried to reach an agreement with Defendants, but could not do so on  
17      the call. I also agreed to continue discussions with Defendants, and to send search parameters to  
18      Defendants in an attempt to compromise on certain requests.

19          7.       Another conference occurred on January 3, 2024. During that conference, the  
20      parties again discussed ISI's requests for production and other discovery. ISI again pressed for a  
21      compromise and to set the schedule for document production and other discovery.

22          8.       A third conference occurred on January 22, 2024, following an unsuccessful  
23      attempt to resolve the case through mediation. During that conference I again attempted to address  
24      Defendants failure to produce documents, and at minimum, to identify the issues where the parties  
25      had reached impasse. To that end, I send a post-conference email to Defendants' counsel asking  
26      that they either agree to various requests and offers to compromise, or at least confirm Defendants'  
27

1 opposition by certain dates. Defendants' counsel has not responded as of the date of this  
2 declaration.

3 9. Attached to ISI's motion to compel are the following exhibits:

- 4 • Exhibit 1 is a true and correct copy of an email that I sent to John Tennert and Wade  
5 Beavers (among others) on December 4, 2023, following the receipt of Defendants'  
6 objections and responses to ISI's discovery requests.
- 7 • Exhibit 2 is a true and correct copy of Defendant Amelco USA, LLC's objections  
8 and responses to ISI's requests for production, served December 4, 2023.
- 9 • Exhibit 3 is a true and correct copy of Defendant Amelco UK, Ltd.'s objections and  
10 responses to ISI's first interrogatories, served December 4, 2023.
- 11 • Exhibit 4 is a true and correct copy of an email exchange between me and John  
12 Tennert (among others). The most recent email in this exhibit is dated December  
13 11, 2023.
- 14 • Exhibit 5 is a true and correct copy of an email that I sent to John Tennert and Wade  
15 Beavers (among others) on December 13, 2023. Exhibit 6 is a true and correct copy  
16 of search parameters that were attached to that email and sent to Defendants.
- 17 • Exhibit 7 is a true and correct copy of an email that I sent to John Tennert and Wade  
18 Beavers (among others) on January 4, 2024. Exhibit 8 is a true and correct copy of  
19 revised search parameters that were attached to that email and sent to Defendants.
- 20 • Exhibit 9 is a true and correct copy of an email exchange between me and John  
21 Tennert (among others). The most recent email in this exhibit is dated January 22,  
22 2024.
- 23 • Exhibit 10 is a true and correct copy of an email exchange between me and Wade  
24 Beavers (among others). The most recent email in this exhibit is dated November  
25 17, 2023.
- 26
- 27
- 28

- Exhibit 11 is a true and correct copy of the requests for production ISI served on Amelco USA, LLC on October 20, 2023.<sup>1</sup>

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

DATED: January 29, 2024

**MCKOOL SMITH, PC**

/s/ Travis DeArman

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*Internet Sports International, Ltd.*

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<sup>1</sup> We have added page numbers to the exhibit submitted to the Court, for ease of reference.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing was filed on January 29, 2024 via the Court's CM/ECF electronic filing system addressed to all Parties on the e-service list.

/s/ Travis E. DeArman  
Travis DeArman